

### **REMARKS**

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1, 2, 4-12, 14, 15, 17 and 18 are pending in the present application and have been amended by the present amendment.

In the outstanding Office Action, claims 1 and 15 were rejected under 35 U.S.C. § 101; and claims 1, 2, 4-8, 12, 14, 15, 17 and 18 were rejected under 35 U.S.C. § 103(a) as unpatentable over Thackston et al. in view of Kask et al.

#### **35 U.S.C. § 101 Rejection**

The preamble of independent claims 1 and 15 has been amended to clarify that the method is for making a product, which is discussed throughout the specification (see, for example, the Description beginning at page 6, line 10 and Figure 1). Accordingly, it is respectfully requested this rejection be withdrawn.

#### **35 U.S.C. § 103 Rejection**

Claims 1, 2, 4-8, 12, 14, 15, 17 and 18 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Thackston et al. in view of Kask et al. This rejection is respectfully traversed.

Independent claim 1 includes a combination of elements and has been amended to recite that the subjecting step further includes providing a screen for allowing a user to selectively designate a format of the product design data among a plurality of formats for different product design data and to designate a format of the mold design data among a plurality of formats for different mold design data such that the product design data is converted into the mold design

data to design the mold for making the product designed with the product design data. Independent claims 15 and 18 include similar features in a varying scope.

These features are supported at least by page 10, lines 5-14, for example. Thus, the user can advantageously select between a plurality of formats for different product design data and a plurality of formats for different mold design data such that the product design data is converted into the mold design data to design the mold for making the product designed with the product design data.

On the contrary, Thackston et al. is merely directed to an engineering design process having a centralized server with design data that can be retrieved by several users (see column 4, lines 35-50, for example). However, in Thackston et al., data neutrality is provided by maintaining design models in a common, neutral format, and providing utilities so that the user specialized product design model software formats do not present barriers to participate in a collaborative engineering effort (see column 9, lines 5-10). Thus, the neutral format of the data presented to the different users is always in the same neutral format. Thackston et al. does not provide a plurality of different formats for product and mold design data that may be selectively selected as in the present invention. Kask et al. also does not teach or suggest these features.

Accordingly, it is respectfully submitted independent claims 1, 15 and 18 and each of the claims depending therefrom are allowable.

### **CONCLUSION**

Since the remaining references cited by the Examiner have not been utilized to reject the claims, but merely to show the state-of-the-art, no further comments are deemed necessary with respect thereto.

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact David A. Bilodeau, at (703) 205-8072 in the Washington, D.C. area.

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Respectfully submitted,

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